

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

DEBBIE PLUCKER,

Plaintiff,

vs.

UNITED FIRE & CASUALTY COMPANY,

Defendant.

Civ. 12-4075

**AFFIDAVIT OF ROBERT D. TRZYNKA
IN SUPPORT OF PLAINTIFF'S REPLY
TO DEFENDANT'S RESPONSE TO
PLAINTIFF'S RULE 37(B) MOTION
FOR SANCTIONS**

STATE OF SOUTH DAKOTA

)

: SS

COUNTY OF MINNEHAHA

)

Robert D. Trzynka, after being duly sworn upon his oath, states as follows:

1. I am one of the attorneys representing Debbie Plucker in the above-captioned lawsuit. I possess personal knowledge of the issues stated herein and have made due inquiry as to their status as of the date of this affidavit.

2. True and correct copies of the following documents are referenced in the Plaintiff's Reply to Defendant's Response to Plaintiff's Rule 37(b) Motion for Sanctions:

A. Exhibit A is a true and correct copy of excerpts from Sniffen Personnel File and is filed under seal pursuant to Protective Order [Doc. 13];

B. Exhibit B is a true and correct copy of the Sniffen Training Manual and is filed under seal pursuant to Protective Order [Doc. 13];

C. Exhibit C is a true and correct copy of Defendant's Certification;

D. Exhibit D is a true and correct copy of excerpts from the Claims File and is filed under seal pursuant to Protective Order [Doc. 13];

E. Exhibit E is a true and correct copy of the July 26, 2011, email from Justice to United Fire;

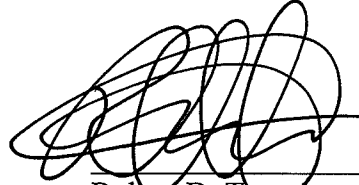
F. Exhibit F is a true and correct copy of excerpts from Schares Personnel File and is filed under seal pursuant to Protective Order [Doc. 13];

G. Exhibit G is a true and correct copy of the Compensation Spreadsheet and is filed under seal pursuant to Protective Order [Doc. 13].

H. Exhibit F is a true and correct copy of excerpts from Conner Personnel File and is filed under seal pursuant to Protective Order [Doc. 13];

I. Exhibit I is a true and correct copy of the March 6, 2014, email from DeNure to Trzynka.

Dated this 10th day of March, 2014.


Robert D. Trzynka

Subscribed and sworn to before me
this 10th day of March, 2014.

Connie M. Leckner
Notary Public – South Dakota
My Commission Expires: 11-10-15

[SEAL]



CERTIFICATE OF SERVICE

I certify that on the 10th day of March, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the appropriate parties:

Lon Kouri

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Eric DeNure

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/s/ Robert D. Trzynka

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